

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

AKEEM HENDERSON and JENNIFER
ALEXANDER, INDIVIDUALLY AND
AS ADMINISTRATRIX OF THE
SUCCESSION OF A. H.

VERSUS

WILLIS-KNIGHTON MEDICAL
CENTER d/b/a WILLIS KNIGHTON
SOUTH HOSPITAL

CIVIL ACTION NO. 5:19-CV-00163

JUDGE ELIZABETH E. FOOTE

MAGISTRATE JUDGE
MARK L. HORNSBY

AFFIDAVIT OF PLAINTIFF, JENNIFER ALEXANDER

BE IT KNOWN that on this 6th day of May, 2020, before me, the undersigned Notary,
personally came and appeared JENNIFER ALEXANDER, who after being duly sworn, did
depose and state the following, to-wit:

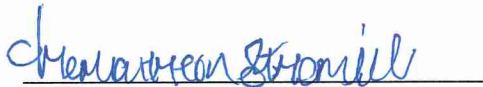
1. Affiant is the mother of A.H. and plaintiff in the captioned lawsuit.
2. A.H. was born pre-mature and suffered a history of respiratory illness, as well as, numerous emergency department visits and hospitalizations at Willis Knighton South due to same.
3. Affiant took A.H. to Willis Knighton South Emergency Department (ED) at approximately 2:00 a.m. on February 10, 2018, after a breathing treatment at home with Albuterol failed to bring A.H. relief from an asthma attack and difficulty breathing.
4. Affiant remained with A.H. the entire time the child was in the emergency department and knows of her own personal knowledge that A.H. was examined by Dr. Easterling approximately thirty minutes after affiant arrived at the ED, the exam lasted approximately fifteen minutes, and thereafter, neither Dr. Easterling, nor any other doctor, laid eyes on, much less, examined A.H. again, prior to A.H. being discharged at approximately 4:00 a.m.
5. At the time A.H. was discharged, she was wheezing and breathing more rapid than normal.



6. Affiant took A.H. to the child's grandmother's home after leaving the hospital. Upon arriving at her grandmother's, A.H. had difficulty getting out of the car and was not physically able to climb the few steps to the front door.
7. At approximately 7:00 a.m. that morning, Affiant was advised by her mother that A.H. was unresponsive and that 911 had been called to transport A.H. to Willis Knighton Bossier.
8. A.H. never regained consciousness and died February 16, 2018, after life support was discontinued.
9. The above statements are true and correct to the best of Affiant's personal knowledge, information and belief.



JENNIFER ALEXANDER

WITNESSES:





SWORN TO AND SUBSCRIBED before, me, the undersigned Notary, in Shreveport,
Caddo Parish, Louisiana on this 6th day of May, 2020.


NOTARY
Huxton Rabe
LBN 37577